

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10378-GAO
)	
ROSS ELLIOTT)	
)	

MOTION TO CHANGE CONDITIONS OF RELEASE

Now comes Defendant Ross Elliot and moves this Honorable Court to change the conditions of his release to permit his stepson, Kenysson Ferreira, to have internet access in his room.

As grounds for this motion, Defendant states as follows:

1. On or about December 16, 2005, Defendant was arrested on the charge of possession of child pornography. 18 U.S.C. §2252(a)(4);
2. The Defendant appeared before Magistrate Judge Alexander on December 16, 2004, and was released on an unsecured bond with conditions of release;
3. The conditions of release included a stipulation that Defendant have “no access to internet”, which pretrial services has construed to mean internet access in Defendant’s home;
4. The Defendant resides at 85 Merriam Street, Somerville, MA, with his wife and stepson, Kenysson Ferreira, who is 18 years of age;
5. The condition that there be no “internet access” in Defendant’s home has precluded Defendant’s stepson from having or utilizing the internet in his room, and has thus adversely affected the Defendant’s family and caused friction and conflict between Defendant and his wife and stepson;

6. The Defendant thus seeks a change in the conditions of release to the extent required to permit his stepson to have internet access in his room. Such conditions would continue to preclude Defendant's access and may include whatever additional conditions deemed necessary by Pretrial Services to ensure Defendant's compliance.

Wherefore, Defendant prays that this motion be allowed.

DEFENDANT

By his attorney

/s/John F. Palmer

John F. Palmer

Law Office of John F. Palmer

24 School Street, 8th Floor

Boston, MA 02108

(617)723-7010

BBO# 387980

Dated: November 22, 2005

CERTIFICATE OF SERVICE

I hereby certify that the document entitled “Motion To Change Conditions Of Release,” filed through the ECF system on November 22, 2005, was sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on July 7, 2006.

/s/John F. Palmer
John F. Palmer